

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

CASE NO. 3:19-cr-00001-TJC-PDB

UNITED STATES OF AMERICA,

v.

**JOHN R. NETTLETON,
Defendant.**

UNOPPOSED MOTION TO TRAVEL FROM AUGUST 7 THROUGH AUGUST 28, 2019

Defendant JOHN R. NETTLETON, by and through undersigned counsel, files this unopposed motion requesting permission to travel, and states in support:

1. Defendant is presently on pre-trial release. The terms of his release require him to remain within the Middle District of Florida.

2. Defendant owns a home in West Virginia. Until recently, Defendant rented the home to a tenant. Last week, the tenant was ordered to vacate the property on August 7, 2019.

3. Defendant requests permission to travel to West Virginia between August 7, 2019, and August 28, 2019. The purpose of the trip will be to fix and improve the property so that Defendant can place it on the market. The property requires for work to be done, which Defendant intends to do himself. Since there is no longer a paying tenant, Defendant cannot afford to keep the property and must place it for sale as soon as reasonably possible.

4. Defendant, if permitted, will drive from the Middle District of Florida to West Virginia so that he can transport his tools to fix the property.

5. Defendant will provide his pre-trial officer with all pertinent information related to the West Virginia property, including the address, prior to traveling.

6. Defendant intends to stay at his West Virginia property. But if the tenant has not vacated the property by August 7, Defendant will have to stay with a friend in Virginia for that night awaiting the tenant's removal the next day. In such event, Defendant will provide his pre-trial officer with this address, as well.

7. Opposing counsel Todd Gee, of the U.S. Dept. of Justice, has stated that the Government does not oppose this motion.

WHEREFORE, Defendant requests for permission to travel to West Virginia (and, if necessary, Virginia) from August 7, 2019, through August 28, 2019, for the reasons stated herein.

Submitted on July 22, 2019, by

s/ Daniel Schwarz
Daniel Schwarz
Fla. Bar No. 84665
Daniel Schwarz, P.A.
245 SE 1st Street, Suite 404
Miami, FL 33131
Phone: (305) 557-4671
Fax: (305) 503-6973
Daniel@danielschwarzlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF, and thereby served on all interested parties.

s/ Daniel Schwarz
Daniel Schwarz